

92 RF 9048

# EG&G ROCKY FLATS

ADMIN A		
MAN H S		
NCH DB		
NI VAL G J		
P R D		
S J G		
RED JE	X	X
PERA D W		
DWIN R		
NI BJ		
MAN L K		
T J		
G J G		
ER E H		
SH J M	X	X
BY W A		
STER A W		
G D		
EM		
ESTIC J R		
X G E		
ONALD M M		
GAN R V	X	X
TER G L	X	X
TO V M		
IN N B		
PER B I		
JIVAN M T		
INSON E R		
MAN K G		
BE J S		
INSON R R		
SON J M		
EO		
FE	X	X
LE C	X	X
U A	X	X
CH H	X	X
WY - PUS	X	X
DISN R	X	X
DISN C	X	X
DISN F	X	X
DISN T	X	X
DISN O	X	X
DISN A	X	X
RES CONTROL	X	X

EG&G ROCKY FLATS, INC.

ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 (303) 966-7000

August 11, 1992

92-RF-9048

## ADMIN RECORD

Terry A. Vaeth  
Manager  
DOE, RFO

Attn: J. K. Hartman

EXPIRATION OF INTERIM STATUS FOR RESOURCE CONSERVATION RECOVERY ACT (RCRA)  
UNITS - JMK-0759-92

Enclosed is a draft letter to the Colorado Department of Health (CDH) defining the regulatory status of RCRA interim status units with respect to the November 8, 1992, interim status deadline. This letter is the result of several recent discussions my staff has had with CDH attempting to clarify the interim status expiration provisions of the Colorado Hazardous Waste Regulations.

If you have any questions regarding this issue, please contact Pam Edrich at extension 7752 or Bill Bruninga at extension 8281.

*J.M. Kersh*  
J.M. Kersh, Associate General Manager  
Environmental and Waste Management

WMB:sf

Orig. and 1 cc - T. A. Vaeth

Enclosure:  
As Stated

DOCUMENT CLASSIFICATION  
REVIEW WAIVER PER  
CLASSIFICATION OFFICE

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CLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

AUTHORIZED CLASSIFIER  
SIGNATURE

DATE 8-11-92

REPLY TO RFP CO

EM STATUS  
CLOSED

PARTIAL  
APPROVALS: 8/11

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DRAFT

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DRAFT

Gary W. Baughman, Unit Leader  
Hazardous Waste Facilities  
Hazardous Materials Waste Management Division  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, CO 80220

Mr. Frederick R. Dowsett, Ph. D.  
Monitoring and Enforcement Unit Leader  
Hazardous Materials and Waste Management Division  
Colorado Department of Health  
4210 East 11th Avenue  
Denver, CO 80220

Gentlemen:

Based on 6 CCR 1007-3, Parts 100.20(a), 100.20(c)(6) and 40 CFR 270.73, we believe interim status does not expire on November 8, 1992, for the following operational Rocky Flats Plant (RFP) RCRA units:

1. Units described in the various Rocky Flats Plant (RFP) Part B Permit applications submitted to the Colorado Department of Health (CDH) before November 8, 1988.
2. Units which gained interim status after November 8, 1984, were included in the RFP Part B Permit application submitted to CDH in November, 1986, but were removed from the application prior to November 8, 1988. This refers specifically to the following three units withdrawn from the November 1986 Part B Permit application because it was believed they would not be operated past November 8, 1992:
  - Unit 6, Chip Drum Storage Area, Building 447
  - Unit 21, Pondcrete Storage Area, Building 788
  - Unit 25, Mixed Waste Storage Area, 750 Pad
3. Units which gained interim status after November 8, 1988, and therefore, were not included in pre-November 1988 Part B Permit applications.

Enclosure

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The Department of Energy, Rocky Flats Office, hereby requests confirmation or clarification of the above interpretation. We request your response by September 1, 1992.

If you have any questions, please contact Debbie Mauer at 966-5598.

cc:

M. Hestmark, EPA Region VIII  
P. W. Edrich, EG&G Rocky Flats, Inc.  
J. M. Kersh, EG&G Rocky Flats, Inc.  
A. L. Schubert, EG&G Rocky Flats, Inc.